

District Judge Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE UNIVERSITY OF WASHINGTON, a
Washington State Agency; THE CENTER FOR
HUMAN RIGHTS AT THE UNIVERSITY OF
WASHINGTON, a research center created by state
law; and ANGELA GODOY, Director of the
Center for Human Rights at the University of
Washington,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; and UNITED STATES
IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendants.

Case No. 2:22-cv-01329-TL

STIPULATION AND MOTION FOR
EXTENSION OF TIME

Noted For Consideration:
November 30, 2023

The parties make the following stipulation and move to extend the trial date and related deadlines.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

1 The parties submit there is good cause for an extension of the deadline. Since the last
2 extension, ICE has produced additional information and the parties have exchanged proposals in
3 good faith on one remaining request. The parties are continuing to narrow the issues and remain
4 hopeful that the matter can be resolved without briefing on the merits. The parties want to work
5 through the few remaining issues expeditiously with using as little Court resources as possible.

6 Counsel have conferred and the parties jointly request that the below dates be extended
7 based on the parties' continuing efforts to date. The parties both agree that additional time is
8 necessary in order to properly work through the issues in this case and resolve it without the
9 need for motion practice or at least minimizing the number of issues that need to be brought to
10 the Court's attention. Continuing the existing deadlines for a limited time will allow the parties
11 to efficiently address all issues for the Court's review.

12 The parties propose the following deadlines:

13

<u>Deadline</u>	<u>Current Date</u>	<u>Extended Date</u>
Discovery Cutoff	November 30, 2023	January 29, 2024
Dispositive Motions	January 5, 2024	March 5, 2024

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17 DATED this 30th day of November, 2023

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s/ Daniel A. Fiedler

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Counsel for Defendants

I certify that this memorandum contains 248 words in compliance with the Local Rules.

Counsel for Plaintiffs

ORDER

The parties having stipulated and agreed, it is hereby so ORDERED.

DATED this _____ day of _____, 2023.

TANA LIN
United States District Judge